Darlington Local Development Framework Core Strategy: Test of Soundness Self Assessment

October 2010

Key question	Possible evidence	Evidence provided
Justified		
Participation		
Has the consultation process allowed for effective engagement of all interested parties?	The consultation statements	The Regulation 27 Consultation Statement sets out how the Borough Council engaged effectively with all parties and persons interested in the preparation of the Core Strategy. The statement sets out who was invited to make representations, how this was done, what were the main issues and how these representations were taken into account. This analysis was undertaken for the following formal stages of the Core Strategy, namely: Issues and Options (Jan 2008), Preferred Options (Dec 2008) and Revised Preferred Options (Jan 2010). Regulation 30(1)(e) Statement of Representations and Summary of Main Issues sets out the number of representations made to the Publication Draft (Aug 2010) and summarises the main issues raised.
Research/ fact finding		
2. Is the content of the development plan document justified by the evidence?3. What is the source of the evidence?4. How up to date and convincing is it?	 i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the pre-submission proposals documents iii. Sections of the preferred strategy report iv. Sections of the sustainability appraisal report which set out its main capalyzions in relation to the policies. 	The supporting text for each Core Strategy policy refers to relevant evidence based studies that informed the formulation of the policy. Appendix 2 of the Submission Core Strategy sets out a comprehensive list of key studies underpinning preparation of the Core Strategy.
io it:	set out its main conclusions in relation to the policies in the development plan document v. Sections of the consultation statement OR A very brief statement of how the main findings of consultation support the policies, with reference to: o reports to the council on the issues raised	Appendix 3 lists the strategies, plans and programmes taken into account. Sections 6 and 7 of the Sustainability Appraisal summarises the findings from the appraisals of the Preferred Options Core Strategy policies, and the Revised Preferred Options policies. The

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	during participation, covering both the front- loading and formulation phases any other information on community views and preferences vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted OR For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)	results of which influenced the policies in the Submission Core Strategy. Sections 2 to 4 of the Regulation 27 Consultation Statement provides a summary of the main issues raised by consultees and how they have been addressed. The majority of the evidence based studies date from 2009 onwards and are considered to be as up to date as is practicable. The second edition of the Strategic Housing Land Availability Assessment (SHLAA) was published in November 2009 and an update is currently underway. An Economic Viability Assessment of Housing Land was published by Levvel in June 2010. An updated and revised Employment Land Review (ELR), was published in December 2009. An Economic Viability Assessment of Non-Housing Land was published by Levvel in July 2010. A Retail Study, published by Martin Tonks in 2008, was updated in June 2010. A Level 2 Strategic Flood Risk Assessment was published by JBA Consulting in 2010. A Decentralised and Renewable or Low Carbon Energy Study was updated by Entec in June 2010. A Transport Area Action Plan for Darlington was published by Arup in June 2010. A Playing Pitch Strategy and a Sport and Recreation Facilities Strategy were published by PMP Consultants in June 2009.
5. What assumptions had to be made in preparing the development plan document?6. Are the assumptions reasonable and justified?	 i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, correspondence from bodies consulted or technical 	The assumptions are referred to in the text supporting each policy. The evidence leading to those assumptions is contained within the Key Studies listed in Appendix 2 and the Strategies and Plans listed in Appendix 3 to the Core Strategy. The key assumptions are: The local economy is likely to grow over the plan period with Experian forecasting an

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	papers that provide the basis for assumptions	increase of 2,178 jobs between 2009 and 2026 (Table 25, ELR 2009).
		 Not all of this growth will translate into investment in new buildings as 15% is likely to be accommodated within existing premises (para 6.122, ELR 2009).
		 Experian forecast a requirement for 101.5ha of employment land (para 6.132, ELR 2009).
		 5,813 net additional dwellings are required 2011-2026 to: accommodate new households forming within the existing population; to reflect local economic growth and, to replace obsolete housing stock (paras 6.1.1-6.1.4 Submission Core Strategy).
		 The housing trajectory anticipates that approximately 75% of new dwellings will be built on previously developed land until 2021, when the figure will fall to about 60% (Figure 6.2 Submission Core Strategy).
		Approximately 750 proposed dwellings and 86ha of proposed employment land are located in Flood Zone 1. Approximately 4900 new dwellings and 195ha of new employment land are located in Flood Zone 2. However, not all of the sites are located in places that would enable the highest regeneration benefits to be secured nor the most desirable sustainable development to be achieved. Therefore, to address the wider sustainability and regeneration objectives of the Core Strategy, the brownfield locations of the Town Centre and Town Centre Fringe are included as strategic locations for future development, despite being located in Flood Zone 3 (paras 3.1.1-3.4.4, PPS25 Sequential Test and Exception Test for the LDF Core Strategy).
		 There is no capacity to support additional

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		convenience floorspace until 2026 and there is no need to identify a five year land supply of sites for convenience retailing (paras 3.14-3.31, Darlington Retail Study 2010).
		By 2016 there is expected to be a small amount of additional capacity (£11.7m) for comparison goods, supporting around 4,300 sq m (gross). By 2021 it will become more significant supporting around 16,600 sq m (gross) comparison goods floorspace and by 2026 the surplus £93.9m would support around 27,000 sq m (gross) of additional town centre floorspace (paras 4.19-4.31, Darlington Retail Study 2010).
		 The Borough's Growth Strategy is likely to increase demand for electricity by approximately 10% and demand for heat by 13% (para 3.3.2 Submission Core Strategy).
		Within the Borough, there is relatively low but increasing car ownership, high but declining bus usage, and significantly increased levels of walking and (from a low base) cycling. Rail patronage is also rising. There is considerable potential to achieve reductions in car use (para 9.11 Submission Core Strategy).
Alternatives		
7. Can it be shown that the council's chosen approach is the most appropriate given the	Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options	Issues and Options document, Preferred Options and Revised Preferred Options show that the chosen approach is the most appropriate.
reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how	Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered	Reg 27 Consultation Statement has a section on the consultations that were carried out at each Reg 25 stage
and why the preferred strategy/approach was arrived at?	iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised	Copy of response form at Issues and Options Housing options appraisal published at Revised Preferred Options
Where a balance had to be struck in taking decisions	iv. Sections of the preferred strategy report explaining:	Connections study has sections where different housing locations were considered. Cabinet reports give reasons why some options

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between competing alternatives is it clear how and why these decisions were made?	 how alternatives were developed and evaluated, and why alternatives were rejected in favour of the preferred strategy Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document Sections of the consultation statement explaining how the main findings of consultation support the decisions Sections of the representations statement A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed Any other documentation showing how alternatives were developed and evaluated A very brief statement and any other supporting documentation of the way decisions have been taken 	rejected, e.g. housing options at revised preferred options stage. Chapter 5 of the Sustainability Appraisal Report shows the options and alternatives considered in production of the Core Strategy and how they were objectively assessed. The assessments of options against the sustainability objectives are fully shown in Appendix F of the Sustainability Appraisal. Chapter 5 of the Sustainability Appraisal also demonstrates how in nearly all cases, the option found to be the most sustainable by the SA was that taken forward in development of the Core Strategy Preferred Options.
10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?	 i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies 	The sustainability appraisal of the Core Strategy: Issues and Options 2008 shows how the different options perform and appraisals of subsequent versions of the Core Strategy demonstrate that sustainability considerations informed the progression of the development plan document. The appraisals include assessments of the Core Strategy objectives, as well as the policies, and the cumulative effects of preferred options and revised policies. Where negative effects are identified, the appraisals recommend a combination of mitigation measures. Changes are also recommended to enhance the positive effects of policies. Recommended changes in the sustainability appraisals are incorporated in

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		subsequent versions of the Core Strategy.
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?12. Does the strategy take forward the regional context reflecting the local issues and objectives?	 i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with 	Not Applicable.
Effective		
Deliverable		
 13. Has the council clearly identified what the issues are that the development plan document is seeking to address? 14. Have priorities been set so that it is clear what the development plan document is seeking to achieve? 	 i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	Table 2.2 of the Submission Core Strategy identifies the key issues from the Sustainable Community Strategy to be addressed through the development plan document. The Table lists the issues and identifies where they are dealt with within the Core Strategy. Table 2.3 lists other issues and indicates where they are dealt with in the development plan document. Paragraphs 2.23-2.29 set out the spatial vision for the Core Strategy with a commentary on the outcomes which are sought by 2026. Policy CS1 sets out the document's locational strategy and attempts to concentrate new development in sustainable locations within and on the edge of the urban area. The Policy prioritises delivery in named strategic locations.
15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately	Sections of the regional spatial strategy which identify cross-boundary issues. Sections of the development plan document setting	Table 2.1 lists the cross-boundary issues and indicates where they are dealt with in the document. The issues are also identified and addressed in several sub-regional documents

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addressed?	out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations	such as the Tees Valley Strategic Housing Market Assessment 2009, Tees Valley Gateway Study 2004 and Tees Valley City Region: Connectivity and Accessibility Study 2010.
	 iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	
16. Does the development plan document contain clear objectives?	 i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision 	The strategic objectives are listed in paragraph 2.30 of the Submission Core Strategy. Their relationships to the issues are identified in Tables 2.1, 2.2 and 2.3.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?18. Is there a direct relationship between the identified issues and the objectives?	 i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place 	The objectives are Darlington specific, e.g. 1 and 2 relate to the two key strands of the sustainable community strategy, 'One Darlington' and 'Perfectly Placed'. There are specific references to Darlington and the Tees Valley in three other objectives. The strategic objectives are listed in paragraph 2.30 of the Submission Core Strategy. Their relationships to the issues are identified in Tables 2.1, 2.2 and 2.3.
19. Is it clear how the policies will meet the objectives?20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	 i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership and partner organisations that they believe the polices will achieve the agreed objectives iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed 	The relationships between the objectives and the policies are identified in Tables 2.1, 2.2 and 2.3 of the Submission Core Strategy. Every issue has at least one policy designed to address it, so there are no obvious gaps in the policies.

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	v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.	
21. Are there realistic timescales related to the objectives?	 i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery 	The Objectives cover the period upto 2026 (and beyond for some, such as Objectives 1 and 2). The Infrastructure Delivery Plan includes timescales, where they are known, usually linked to approved or committed funding or provided by the infrastructure providers themselves.
22. Are the policies internally consistent?	 i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent 	There have been no representations claiming that the policies are internally inconsistent. Work undertaken as part of the Sustainability Appraisals specifically considers the internal consistency of policies from a sustainability perspective.
 23. Does the development plan document contain material which: is already in another plan should be logically be in a different plan should not be in a plan at all? 	 i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	Figure 1.1 in the Submitted Core Strategy shows the relationship between the Core Strategy and the other local development framework documents. There have been no representations claiming that any of the material within the Core Strategy is inappropriate.
24. Does the development plan document explain how its key policy objectives will be achieved?	 i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	The strategic objectives are described in paragraph 2.30 of the Submission Core Strategy. Delivery will be achieved through implementation of the Core Strategy Policies and through the implementation of policies yet to be published in other development plan documents, such as the Accommodating Growth DPD, the Making Places DPD, the Town Centre Fringe Area Action Plan and the Design of New Development Supplementary planning Document.
25. If there are development management policies, are they	Sections of the development plan document that show how the development management policies:	Section 3.2 and Policy CS2: Achieving High Quality, Sustainable Design derive from and

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supportive of the strategy and objectives?	 will help to deliver the strategy derive from, and elaborate on, the objectives and policies of the plan 	support several Strategic Objectives 1, 2, 6, 7 and 8. Section 3.3 and Policy CS3: Promoting Renewable Energy derive from and support Objective 1.
		Section 3.4 and Policy CS4: Developer Contributions derive from and support Objectives 1, 2, 3, 4, 6, 7 and 8.
		Section 5.1 and retail Policies CS7, CS8 and CS9 derive from and support Objectives 2, 3,5 and 7.
		Paragraphs 6.1.2-6.2.10 and housing Policies CS10 and CS11 elaborate on and support Objectives 2 and 4.
		Section 6.4 and Policy CS13: Accommodating Travelling Groups elaborates on and supports Objectives 2, 6 and 7.
		Section 7.1 and Policy CS14: Promoting Local Character and Distinctiveness elaborate on and support Objectives 5, 6 and 7.
		Section 7.2 and Policy CS15: Protecting and Enhancing Biodiversity and Geodiversity elaborates on and supports Objective 7.
		Section 7.3 and Policy CS16: Protecting Environmental Resources, Human Health and Safety elaborates and supports Objectives 1 and 7.
		Section 8.1 and Policy CS17: Delivering a Multifunctional Green Infrastructure Network elaborates on and supports Objectives 6 and 7.
		Section 8.2 and Policy CS18: Promoting Quality, Accessible Sport and Recreation Facilities elaborates on and supports Objectives 2 and 6.
		Chapter 9 and Policy CS19: Improving Transport Infrastructure and Creating a Sustainable Transport Network elaborates on and supports Objectives 1, 2, 5 and 8.
26. Have the infrastructure	i. A section or sections of the development plan	The Infrastructure Delivery Plan (IDP) identifies

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implications of the strategy/policies clearly been identified?	document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with	the key pieces of infrastructure needed to achieve the objectives and policies in the Core Strategy, the broad locations where the infrastructure will be located as well as their delivery mechanisms.
		The infrastructure providers have been consulted at every stage of the Core Strategy process and have been consulted on draft versions of the IDP. Their comments are reflected in the submitted IDP.
		The responses to the IDP (or LIP as it was then), officer responses and proposed changes for the Core Strategy: Revised Preferred Options is on the Core Strategy page of the website. Responses were reported to Economic aand Environment Scrutiny Committee (EESC).
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	 i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered 	and timing of new housing. Policy CS11 sets out the targets for affordable housing and
	iii. Research or studies that address matters of delivery and the realistic timescales	to the transport network in the short, medium and long terms.
	 iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms 	The Implementation Framework (Chapter 10) sets out the main ways each of the Core Strategy Policies will be delivered. More detail about exactly what will be provided, where, when and by whom, is set out in the Infrastructure Delivery Plan. All the delivery organisations were consulted on several iterations of the Implementation Framework and no objections
	v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder	
	vi. Correspondence from stakeholders on delivery mechanisms and timescale	have been made to the current version.
	vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with	Consultation reps and emails from various infrastructure partners have been copied into the text in the IDP. Concerns have been highlighted in previous Scrutiny/Cabinet reports (NWL/HA/EA concerns) and these have been resolved.
		The Housing Implementation Strategy 2011-2026

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		(HIMPS) sets out the Council's proposed approach to managing the delivery of housing, particularly overall housing numbers, affordable housing and the use of previously developed land.
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	 i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	The Infrastructure Delivery Plan (IDP) identifies the key pieces of infrastructure needed to achieve the objectives and policies in the Core Strategy, the broad locations where the infrastructure will be located as well as their delivery mechanisms. All the infrastructure providers have been consulted on the IDP and their comments have been incorporated. The responses to the IDP (or LIP as it was then), officer responses and proposed changes for the Core Strategy: Revised Preferred Options is on the Core Strategy page of the website. Responses were reported to EESC.
29. Is it clear who is intended to implement each part of the strategy/ development plan document?30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	 i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	The Implementation Framework (Chapter 10) identifies the delivery organisations for each Policy. The IDP Schedule (in the IDP) shows where funding has been committed. There is also the LDS which is the 'planning' commitment to deliver the documents to enable the delivery of the sites.
 31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from 	 i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by other agencies iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in 	The plans and strategies of other bodies are referenced in the IDP e.g. East Coast Main Line Route Utilisation Strategy, Network Rail 2008; North East Routes, Route Plan, Network Rail 2008; Tees Catchment Flood Management Plan, Environment Agency 2009; NHS County Durham Five Year Strategy, 2008; Sport England Active People Survey 2, 2008.

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a variety of organisations that influence the nature of places and how they function?	the representation, or include a copy of the substance of the representation	
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	 i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy 	Policy CS10: New Housing Development acknowledges that new housing may not come forward as quickly as envisaged. Therefore, the Policy contains two contingencies to try and deliver the number of dwellings required over the plan period. The HIMPS includes a risk assessment and proposed interventions to maintain delivery of housing numbers, affordable housing and delivery on previously developed land.
Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	 i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	The Annual Monitoring Report contains 42 indicators, of which there are 17 core indicators specified nationally, together with 25 local indicators that reflect the implementation of local planning policies or measure locally significant issues. A further integral part of the assessment of policies has been to explore: • Whether policies are achieving their objectives and in particular, delivering sustainable development; • Whether policies have had unintended consequences; • Whether the assumptions and objectives behind policies are still relevant; and • Whether the targets are being achieved. The HIMPS includes a risk assessment and proposed interventions to maintain delivery of housing numbers, affordable housing and delivery on previously developed land.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures	Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and	Policy CS10: New Housing Development acknowledges that new housing may not come forward as quickly as envisaged. Therefore, the Policy contains two contingencies to try and

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from an emerging regional spatial strategy?	how that would impact on other aspects of the strategy and on infrastructure provision ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances	deliver the number of dwellings required over the plan period. The HIMPS includes a risk assessment and proposed interventions to maintain delivery of housing numbers, affordable housing and delivery on previously developed land. Policy CS5: Supporting the Local Economy provides a diverse range of sites and locations for employment uses. In total, approximately, three times as much land is provided as is needed.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	 i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing 	At the end of each chapter, in the Core Strategy, a list of indicators are identified which will be used to measure the success of the policies. The HIMPS includes a risk assessment and proposed interventions to maintain delivery of housing numbers, affordable housing and delivery on previously developed land. Table 4.1 identifies the variance from targets which would trigger a review.
Monitoring		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	 i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	At the end of each chapter, in the Core Strategy, a list of indicators are identified which will be used to measure the success of the policies. Table 6.1 identifies the amount and phasing of net additional dwellings required. Figure 6.1 shows the actual and forecast housing completions in strategic locations. Figure 6.2 sets out the previously developed land trajectory 2011-26. The Annual Monitoring Report (AMR) is organised around the saved policies of the adopted Borough of Darlington Local Plan (1997, with alterations adopted in 2001) and the emerging LDF, particularly the Core Strategy DPD. Consequently, wherever common outcomes can be monitored at this time, they are included in the AMR. These outcomes include

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		national indicators included in the Council's Local Area Agreement 2008- 2011 'Delivering One Darlington: Perfectly Placed'.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	 i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators 	Some of the indicators and targets are already measured in existing AMRs. In future, all the indicators listed at the end of each set of CS Policies will be monitored in the AMR. The evaluation of impacts and significant effects is a key element of Sustainability Appraisal (SA) monitoring. As part of shaping plans and programmes, the SA identifies sustainability objectives and seeks to establish the likely significant effects of the plan or programme against these objectives. The final SA's role is to then propose measures to avoid or mitigate any negative effects, and establish a toolkit for monitoring the identified significant effects for the lifetime of the plan. As new documents are adopted, the AMR will be used to monitor the effects of policies against the objectives of SA, in addition to LDF targets and objectives.
39. Are suitable targets and indicators present (by when, how and by whom)?	 i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	The AMR contains a comprehensive list of core output and local indicators along with any relevant targets. This list will be reassessed every year and new indicators and targets added when considered necessary.
National policy		
 40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification? 	 i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement 	The Council believes that the Submission Core Strategy does not contain any policies that are inconsistent with national policy. GONE's representation on the Draft Core Strategy did not identify any inconsistencies with national policies (reference 006.01.CS0.S).

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	 iv. Representations from the Government Office on the preferred strategy or the submitted development plan document 	
	 Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	
42. Does the development plan document contain policies that do not add anything to existing national guidance?43. If so, why have they been included?	 i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	The Council believes that the Pre-Submission Core Strategy does not contain policies that do not add anything to national guidance. GONE's representation on the Publication Draft Core Strategy did not identify any policies that added nothing to national policies (reference 006.01.CS0.S).